

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

January 31, 2020

By Hand Delivery

Hon. Paul A. Crotty
Judge, United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In their January 27, 2020, letter the government noted that there were (from their perspective) two outstanding issues. On January 13, 2020, the defense provided to the Court (at the direction of the CISO), a list of outstanding issues. For the Court's convenience, we have attached our January 13, 2020, letter as Exhibit A. Since then, the defense has filed additional motions (including letter motions) which remain pending: (i) motion to reconsider order denying disqualification; (ii) motion to compel CIA witness addresses and permission to investigate/preclude them; (iii) motion to exclude the government's demonstrative evidence including the demonstrative regarding WikiLeaks; and the letter motions filed this month.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

Sabrina Shroff & Edward Zas
Attorneys for Joshua A. Schulte